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February 24, 2023

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**VIA ELECTRONIC CASE FILING**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Trs. of the N.Y.C. Dist. Council of Carpenters Pension Fund, et al.**  
**v. New York City Acoustics, Inc., et al.; Case No.: 22 CV 0716 (JGK)**

Dear Judge Koeltl:

This firm represent Plaintiffs in the above-referenced action. Plaintiffs write with the consent of Defendants to respectfully request an extension of time to complete discovery, to file dispositive motions and to file the Joint Pre-Trial order. Pursuant to the Court's December 7, 2022 Civil Case Management Plan and Scheduling Order ("Scheduling Order"), the following deadlines are currently in effect:

- a. Deadline to conduct depositions: February 20, 2023
- b. Deadline for fact discovery: March 13, 2023
- c. Deadline for disposition motions: April 7, 2023
- d. Deadline for Joint Pretrial Order: April 28, 2023 or 21-days after the decision on any dispositive motion

See ECF Doc. No. 28.

The Scheduling Order also mandates the parties be trial ready upon 48 hours' notice, 14-days after submission of the Joint-Pre Trial Order or 21 days after the decision of any dispositive motion. Lead counsel for Plaintiffs left Virginia & Ambinder, LLP on February 17, 2023, and the undersigned is taking over the action and plans to take one additional deposition of a non-party witness. As a result, there may be additional document demands following that individual's deposition. I am also scheduled to be out of the country from May 3, 2023 through May 15, 2023 and under the current Scheduling Order I would be unable to be trial ready upon 48-hour's notice within 14-days after submission of the Joint Pre-Trial order. The parties are also engaged in settlement discussions in an attempt to settle Plaintiffs' delinquency claim.

Accordingly, the parties respectfully request that the following dates be extended by the Court:

- a. Deadline to conduct depositions: March 24, 2023
- b. Deadline to complete fact discovery: May 12, 2023

APPLICATION GRANTED  
SO ORDERED

2/24/23   
John G. Koeltl, U.S.D.J.

c. Deadline to submit dispositive motions: June 12, 2023

d. Deadline to submit Joint Pretrial Order: July 7, 2023

All parties consent to this request. This request is the parties' second request.<sup>1</sup>

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Adrianna R. Grancio

Adrianna R. Grancio

cc: Counsel of Record (via – ECF)

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<sup>1</sup> The deadlines to file dispositive motions and the joint pre-trial order were previously modified due to the parties' request to extend discovery. *See* ECF Doc. No. 26. The parties have not previously made an explicit request for an extension of the deadlines specific to filing dispositive motions and the joint pre-trial order.